

Exhibit C

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

IN RE: BABY FOOD PRODUCTS
LIABILITY LITIGATION

Case No. 24-MD-3101-JSC

MDL 3101

This document relates to:

ALL ACTIONS

**SHORT FORM DEFENDANT FACT
SHEET**

Defendant must complete this Short Form Defendant Fact Sheet and identify or provide documents and/or data relating to each Plaintiff responsive to the questions set forth below to the best of Defendant's knowledge. In completing this Fact Sheet, you must provide information that is true and correct to the best of your knowledge. In the event this Fact Sheet does not provide you with enough space for you to complete your responses or answers, attach additional sheets as necessary.

YOU, YOUR, or YOURS: As used herein, the terms You, Your, or Yours mean the responding Defendant(s) and any officers, agents, attorneys, employees, representatives or others active on Defendant's behalf.

PLAINTIFF: As used herein, the term Plaintiff refers to the minor plaintiff bringing suit.

HEAVY METAL TESTING: As used herein, the term Heavy Metal Testing refers to any and all testing for the presence of Heavy Metals, including but not limited to Arsenic, Lead, Mercury, and Cadmium.

Please provide an answer for each question and do not leave any answer space blank. If you do not know or cannot recall information required to answer a question, please indicate that in the response. If a question is not applicable to you, please indicate that it does not apply.

- 1 **1. For each commercial baby food product identified in the Initial Plaintiff Fact Sheet**
 2 **and/or Plaintiff's Preservation Statement, please provide the below-requested**
 3 **information:**

Baby Food Product	Years Product Was Sold Within State in Which Plaintiff Resided	Identification number associated with product (SKU, etc) and internal product names

- 9 **2. For each commercial baby food product identified in the Initial Plaintiff Fact Sheet**
 10 **and/or Plaintiff's Preservation Statement, please identify all Heavy Metal Testing**
 11 **Documents You have produced in this litigation corresponding to each product:**

Baby Food Product	Bates Number of Heavy Metal Testing Documents Produced	If documents have not been produced, please specify reason why (e.g., in possession of third-party)

- 18 **3. For each commercial baby food product identified in the Initial Plaintiff Fact Sheet**
 19 **and/or Plaintiff's Preservation Statement, please identify whether the product was**
 20 **manufactured by You, or whether the product was manufactured by a third-party**
 21 **co-manufacturer. If the commercial baby food product at issue was manufactured by**
 22 **a third-party co-manufacturer, please identify that third-party co-manufacturer for**
 23 **each product:**

Baby Food Product	Did Defendant manufacture product or was product manufactured by third-party co-manufacturer?	If applicable, name of third-party co-manufacturer:

4. For each commercial baby food product identified in the Initial Plaintiff Fact Sheet and/or Plaintiff's Preservation Statement that you allege was manufactured by a third-party co-manufacturer, please state whether You required that third-party co-manufacturer to test the product, or it's ingredients, for the presence of Heavy Metals.

Baby Food Product You assert was manufactured by a third-party	Did you Require third-party manufacturer to perform Heavy Metal Testing?	Bates Number of contract/agreement with third-party that has been produced regarding testing

5. If you sold baby food products that were manufactured by a third-party co-manufacturer, and you required that third-party to perform Heavy Metal Testing, do you have any contracts or agreements with those third parties regarding testing requirements?

_____ YES _____ NO

6. If you answered "YES" to question 5, have any and all such contracts and agreements been produced in this litigation?

_____ YES _____ NO

7. Do You have documents regarding Heavy Metal Testing regarding the commercial baby food products, including ingredient testing, identified in the Initial Plaintiff Fact Sheet and/or Plaintiff's Preservation Statement that have not been produced in this litigation?

_____ YES _____ NO

I, _____, am authorized to make this verification on behalf of Defendant in this action. The foregoing answers to the Short Form Defendant Fact Sheet are true and correct to the best of my knowledge, information, and belief, and are based on a diligent investigation.

Signature: _____

Name: _____

Title: _____

Date: _____

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